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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of) CC Docket No. 95-116
)
Telephone Number Portability) RM 8535

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REPLY COMMENTS OF THE NYNEX TELEPHONE COMPANIES

New England Telephone and
Telegraph Company

New York Telephone Company

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SUMMARY

These Reply Comments submitted by NYNEX address various issues and arguments raised by the Comments filed in response to the Notice of Proposed Rulemaking on Telephone Number Portability, CC Docket 95-116, adopted and released by the Federal Communications Commission ("Commission") on July 13, 1995.

In general, NYNEX believes there is significant support among the commenters regarding a number of issues. Most of the commenters agree that the Commission should focus on service provider portability for geographic numbers. There is also substantial support for continuing with planned trials and other activities to gain a better understanding of the different number portability "solutions". Indeed, the record in this proceeding demonstrates that there is no currently available "solution" for service provider number portability that can be readily deployed. Much work on the part of the industry is still needed. Thus, it would be premature to mandate either a solution or a timeframe for the availability of service provider number portability.

NYNEX believes the Commission should adopt principles to guide the industry's efforts to achieve number portability while at the same time the Commission needs to determine what benefits will be achieved and how they compare to the potential network investment and other costs.

TABLE OF CONTENTS

SUMMARY.....	i
I. INTRODUCTION	1
II. THE RECORD DEMONSTRATES THAT IT IS PREMATURE TO MANDATE EITHER A SOLUTION OR A TIMEFRAME.	2
B. EACH OF THE PROPOSALS IS DEFICIENT IN SOME RESPECT	3
C. INTERIM SOLUTIONS, ALONG WITH ANY OF THEIR ENHANCEMENTS, CAN FILL THE GAP.	7
D. CLAIMS FOR VARIOUS MANDATES ARE UNFOUNDED.	8
III. THE INDUSTRY'S FOCUS IS CLEARLY ON SERVICE PROVIDER PORTABILITY	8
A. THE NEED FOR DEFINITIONS.	9
B. SERVICE AND LOCATION PORTABILITY	9
C. SERVICE PROVIDER PORTABILITY FOR NON-GEOGRAPHIC NUMBERS.	10
IV. NO INCONTROVERTIBLE STUDIES HAVE BEEN PRESENTED REGARDING NUMBER PORTABILITY AS A COMPETITIVE NECESSITY	10
V. FOR ANY IMPLEMENTATION OF A NUMBER PORTABILITY SCHEME TO BE SUCCESSFUL, THE FOLLOWING ISSUES SHOULD BE ADDRESSED.....	13
A. ALL PARTIES MUST COOPERATIVELY PARTICIPATE IF NUMBER PORTABILITY IS TO BE A SUCCESS.....	13
B. THE COMMISSION SHOULD RECOGNIZE THAT A LONG TERM SOLUTION FOR NUMBER PORTABILITY WILL ENTAIL SIGNIFICANT INVESTMENT.	14
C. STRONG ADMINISTRATIVE GUIDELINES WILL BE NECESSARY.	15
VI. CONCLUSION.....	15
APPENDICES A-E	

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

REPLY COMMENTS OF THE NYNEX TELEPHONE COMPANIES

I. INTRODUCTION

¹ The NYNEX Telephone Companies are New England Telephone and Telegraph Company and New York Telephone Company.

number portability proposed in the NPRM.² Yet, many commenters noted the costs of service provider number portability are not well understood at this time and the benefits are still under debate. Thus, there was strong support for allowing the current and planned state trials to proceed so that the Commission and the industry could draw upon that valuable data in order to gain a better understanding of number portability. Moreover, it is also clear from this record that a “long term” or “true” number portability solution does not yet exist. The “solution” and the various addressing schemes are in flux. In fact, work arounds and modifications are still being proposed.

Nevertheless, almost all telecommunications providers strongly recommend Commission oversight of the industry’s efforts. A number of the commenters offered suggestions for principles the Commission could adopt in its efforts to guide the industry. In addition, many commenters recognized that all industry participants must work together cooperatively to ensure successful implementation of any number portability scheme. Almost all commenters are concerned about the costs of any number portability implementation. While most expressed the need for the implementation of fair cost recovery mechanisms, there were some widely divergent views on what constitutes fair. Finally, it was recognized by many that strong administrative guidelines are necessary to preserve numbering resources.

² The Commission also sought information on location and service portability for geographic numbers, and service provider number portability for non-geographic numbers, i.e., 500 and 900 numbers.

II. THE RECORD DEMONSTRATES THAT IT IS PREMATURE TO MANDATE EITHER A SOLUTION OR A TIMEFRAME.

No party to this proceeding has presented a complete and immediately available - i.e., technically feasible - solution for service provider number portability.³ Both MCI and AT&T have suggested that the Commission choose an approach calling for adoption of the MCI Carrier Portability Code (“CPC”) addressing scheme first as part of an “interim data base”⁴ number portability arrangement, then moving to the AT&T Location Routing Number (“LRN”) addressing scheme as part of a long term solution. This suggestion that the industry adopt the CPC proposal as an interim scheme and migrate to the LRN proposal as a long term solution makes clear two important points. First, the CPC addressing scheme, which is claimed to be available currently, is not part of a true long term solution. Second, the LRN addressing scheme which is claimed to be part of a true long term solution is not currently available. Moreover, adopting this approach would require that the industry incur costs that are likely to be substantial, and devote its resources to implement CPC only to turn around and devote even more money and resources to implementing LRN. Clearly, this approach is wasteful and inefficient and should not be adopted.

B. Each Of The Proposals Is Deficient In Some Respect

NYNEX, as well as most of the industry, agrees that a long term solution involves

³ As the NPRM noted, both the House and Senate bills, H.R. 1555 and S. 652, respectively, call for the implementation of “service provider” number portability, but only when technically feasible. As addressed herein, at this time, no technically feasible long term solution has been presented to the industry.

⁴ See AT&T at 31.

the use of a database. The transition from the current interim switch-based solutions to the long term database solution will be long and difficult. One aspect of this transition, the choice of an appropriate addressing scheme, has received the most industry attention. Above and beyond this choice, much other work will be required. However, although the choice of an addressing scheme is only a piece of accomplishing the transition to a long term solution, it is arguably the most important piece. An improper choice could drastically affect the solution and the capabilities it would be able to deliver since the addressing scheme impacts almost all network and call processing components.⁵ The industry is currently reviewing three major addressing schemes -- two already noted above, CPC and LRN, as well as Local Area Number Portability (LANP) for which US Intelco has been the main proponent.⁶ However, as even proponents of these plans have noted, these plans contain some deficiencies or inefficiencies and have noted potential work arounds or further modifications to make their proposals more acceptable.⁷ For example, AT&T notes that its LRN solution will require work arounds for operator services.⁸

⁵ A great deal of work is involved for the industry to develop the components identified in a call model for service provider number portability. See Appendix B. The most efficient use of industry resources would be to focus on one addressing scheme and develop the components for it. A change in the addressing scheme, such as transitioning from CPC to LRN, as MCI and AT&T have suggested, would be costly and time consuming to plan and implement.

⁶ The GTE solution which would require any customer wanting number portability capabilities to take a non-geographic number raises problems generally perceived as insurmountable (See e.g., MFS at 10). The biggest of these problems are that: (1) the GTE "solution" requires the customer seeking number portability to take a number change to begin with, an apparent contradiction in terms; and (2) the limited supply of non-geographic numbers would cause this "solution" to have a definitive capacity limitation.

⁷ The Commission also recognized certain shortcomings in its descriptions of these proposals, and NYNEX summarized the deficiencies of these three proposals in Appendix to its Comments.

⁸ See AT&T comments at n. 27 on the various ways to incorporate Operator Services into a long term solution. Moreover, at the September 1995 Industry Numbering Committee ("INC") Meeting AT&T presented an interim version of LRN, thus, leading to the conclusion that the

Multiple parties have expressed concern that no degradation of service nor loss of features occur through the implementation of number portability. (See e.g., Teleport at 11; US West at 17). Other commenting parties noted a variety of services that will not work adequately in these current proposals⁹, most notably E911.¹⁰

As highlighted by NYNEX in its Comments, implementing any one of these schemes requires significant development and implementation. The ability of any of these solutions to provide all current services with no degradation must continually be analyzed. Any of the three proposals would require significant development work especially in end office switch generics, translations, database design and entry, Operational Support Systems, and may require development or modifications of signaling systems. Moreover, there may be further impacts that are unknown at this time.¹¹ This is why trials must be conducted and be allowed to run their course before any proposal is adopted.¹² The conceptual analysis, which has been done so far, must be followed up with adequate hands-on trials and testing.

MCI claims CPC can be deployed in today's network (MCI at 11). However, as New York Telephone Company ("NYT") has pointed out in connection with the New York State

final version of LRN is not yet available. NYNEX believes the admitted shortcomings of the individual parties that have advocated specific plans serves as the most compelling evidence that no plan is yet complete and ready for deployment.

⁹ For instance, AT&T notes that the LANP solution does not support calling number features (AT&T at 26).

¹⁰ See NCTA at 10; NY PSC at 8; and SCG at 2.

¹¹ Appendix B depicts the technical issues attendant on each proposal in more detail.

¹² Several key states - California, Illinois, and New York - as well as other parties, have asked that the Commission allow the trials in these jurisdictions to continue. (See e.g., MFS at 7). Furthermore, in its order to proceed with a Number Portability Trial (attached), the NYPSC indicates that the FCC proceeding is designed to gather information.

Number Portability Trial, further development is necessary to make the MCI proposal function correctly in the network. NYT has provided an analysis to the NYPSC Staff that identified several technical difficulties associated with the trial of the CPC plan, including (1) certain customers will not be able to use the CLASS features Automatic Callback and Automatic Recall to reach other customers whose telephone numbers are within a “portable NXX”;¹³ (2) calls from certain NYT public phones to customers whose telephone numbers are within a portable NXX code will not be completed; and (3) ISDN data calls made to telephone numbers within a “portable” NXX will not be completed.¹⁴ Although not indicated in the NYT analysis, the three problems noted above will also affect calls to ported customers.

The deficiencies inherent in the CPC proposal which render it unsuitable for the long term also make it an unsuitable interim arrangement. Indeed, one of the proponents of using CPC in the interim, AT&T, readily identifies its shortcomings. Nevertheless, AT&T claims that despite these shortcomings, the industry should devote time and resources to its deployment, even though it should be superseded by LRN. AT&T is wrong. Using CPC as an interim arrangement requires network modifications, software development, database design, and translations work that cannot be built upon for implementation of LRN but instead must be

¹³ A “portable NXX” is an NXX in which one or more numbers have been “ported” or moved to a different service provider. Once one or more numbers have been ported from an NXX, feature interaction problems for other, “non-ported” numbers/customers in that NXX code will occur as the currently defined industry proposals stand.

¹⁴ NYT’s submissions to the NYPSC detailing these problems are attached. MCI has admitted to problems but believes that a series of proposed temporary measures would alleviate many, if not all, of these problems. The need for these measures again indicate a proposal that is not technically feasible in the long term. Additionally, NYT’s vendors have yet to finalize the costs. However, NYT now believes the estimated costs of the trial it provided to the NYPSC to be low. Actual costs will be available at the conclusion of the trial.

modified, changed or re-worked.¹⁵ Time and money spent on CPC implementation could be better directed towards development and implementation of LRN from the beginning. Clearly, the adoption of any interim solution which requires additional expenditures and resources which will not be a part of the final solution is unwarranted.

Finally, the CPC plan provides the industry with very little above and beyond what the current interim (switch-based) arrangements can and do provide. Certainly any additional benefits are not outweighed by the technical limitations and unnecessary costs presented by implementing CPC as an interim step.¹⁶

AT&T did not offer the LRN proposal for the Number Portability Trial in New York. However, based on NYNEX's understanding of the proposal from INC meetings and other industry activities, NYNEX believes it holds the best long term promise. However, AT&T has admitted it is not available now, needs standards development and even then will have certain difficulties with LIDB and Operator Services. (AT&T at n.27). Additionally, the ability to continue to provide E911 with LRN is an ongoing unknown. Obviously, given its life and death ramifications, no proposal can be adopted which will impair the provision and implementation of E911 Services.

C. Interim solutions, along with any of their enhancements, can fill the gap.

As noted in its Comments, NYNEX has already deployed interim solutions using remote call forwarding technology. While NYNEX does not mean to imply that interim arrangements can replace a long term solution, NYNEX does believe that such interim

¹⁵ See Appendix B.

¹⁶ See Appendix A to NYNEX Comments.

arrangements do promote competition and are the best technically feasible alternatives currently available.¹⁷ To the extent the Commission believes interim solutions should be mandated, NYNEX believes these existing arrangements should be adopted, and not other, costly alternatives which divert resources and do not provide additional benefits.

Certain parties have suggested that the interim arrangements should be provided for free. NYNEX already provides these interim offerings at rates much lower than their general call forwarding/remote call forwarding/DID retail prices. No party has provided any sound basis to prohibit NYNEX or any other carrier from charging for services rendered.

D. Claims for various mandates are unfounded.

Several parties have proposed that the Commission initiate mandatory deadlines and/or time frames for the implementation of number portability. (See e.g., Jones at 3; and MFS at 8). Others have proposed enhancements for themselves and/or penalties for the incumbent carriers until number portability is implemented (e.g., discounted access offerings). (See ALTS at 14-16). These demands are uncalled for and unnecessary. Such demands imply that a solution is currently available and ready to be implemented. As discussed above, no robust technical solution has yet to emerge. Moreover, the demand for number portability has yet to be accurately assessed. Mandating a solution, at this time, strictly to claim a “solution” exists is not in the public interest.

¹⁷ A number of non-LECs, as well as LECs, share this view. (See, e.g., NCTA at 12). Also, the Senate bill, S. 652, calls for the availability of interim arrangements such as remote call forwarding and direct inward dial until long term solutions are technically feasible.

III. THE INDUSTRY'S FOCUS IS CLEARLY ON SERVICE PROVIDER PORTABILITY.

Most of the parties focused on service provider portability. NYNEX supports the majority of the commenters, which advocate addressing service provider portability first because it is thought to have the greatest effect on local exchange competition. Although, as NYNEX and other parties have noted in their Comments, any solution developed should be capable of evolving to serve the potential future needs of location and service portability. The industry's resources should not be dissipated in an effort to resolve all of the number portability problems at once.

Moreover, NYNEX believes that it is likely that the industry will gain a better understanding concerning other types of number portability as the solution for service provider portability moves forward.

A. The need for definitions.

In its Comments, NYNEX urged the Commission to adopt uniform definitions. The need for such action by the Commission has been underscored by a reading of the parties' comments. NYNEX sees confusion in the comments with many parties mixing meanings which will further complicate discussions and analysis of the issues involved here. (See e.g., SBC at 4-8, GSA at 7).

B. Service and location portability

As discussed by many parties, location portability is complicated and raises many issues not yet contemplated, let alone understood.¹⁸ However, a better understanding of the

¹⁸ NYNEX Comments at 13-14. See, MFS at 5; NCTA at 3-4, 8; and Niagara Telephone Co.

issues and possible solutions may come from the industry efforts with service provider portability.

Moreover, to a large extent service portability can be cared for by each individual carrier with its own customers. It is not an issue of competitive equity and thus the need for Commission involvement is minimal.¹⁹ Individual carriers wishing to remain attractive to consumers will have incentive to work toward resolving these issues, most notably by more ubiquitous and uniform development and deployment of services attractive to the marketplace. However, again, developments with service provider portability may bring easier and more economic solutions to carriers. Further studies and development of service provider portability, as discussed above, will make clearer to the industry what impacts and options are present.

C. Service provider portability for non-geographic numbers.

There was extremely limited support expressed for service provider portability for non-geographic numbers. NYNEX agrees with the view that the importance of this type of portability cannot be compared to service provider portability for geographic numbers. Thus, the Commission should obtain further evidence before attempting to pursue implementation of solutions to this issue.

IV. NO INCONTROVERTIBLE STUDIES HAVE BEEN PRESENTED REGARDING NUMBER PORTABILITY AS A COMPETITIVE NECESSITY

In its NPRM the Commission notes both the MCI and MFS studies support the view that local number portability capabilities are necessary for local exchange competition. On

¹⁹ Ameritech at 8.

the other hand, Pac Bell and GTE²⁰ have presented studies that deny the specific need for number portability in a competitive local exchange environment. The findings of Pac Bell and GTE point out that a consumer's choice over whether to change service providers can vary on any number of highly specific market factors including geographic location,²¹ market segment, discounts offered, service packaging, and reputation for quality of service.

NYNEX believes that the claims that number portability is an absolute necessity for competition to flourish in the United States may be overstated and notes that the studies supporting these claims are not definitive on the subject. For example, the study sponsored by MCI did not provide the assumptions nor the questions that were asked of consumers. Clearly, the wording of survey questions can influence the answers provided. Additionally, any of the data provided can be interpreted in various ways or be seen to mean different things.²² Thus, the

²⁰ GTE's results, as described in their comments at pp. 3-7, are preliminary. GTE has said they expect to provide their complete results when available.

²¹ Clearly from the comments filed, the organizations representing the predominantly smaller telephone companies serving rural areas find it unlikely that competition will be seen in their area any time soon and thus believe the burdens associated with service provider portability should not be placed on these companies. (See e.g., GVNS, NECA, NTCA, OPASTCO, TDS Telecom). At the same time, it is in the urban areas that the highest percentages of churn and unlisted numbers are found. NYNEX does not mean to imply that these factors replace any perceived need for number portability, they do clearly imply that some consumers are less attached to their numbers and thus are more willing to accept a number change under various conditions. Therefore, number portability is less important to some customers than to others.

²² For example, in figure 10, MCI demonstrates that 25% of the customers interviewed are unlisted. However, other carriers have experienced far higher numbers, double in some cases, of the percentages of nonpublished numbers. GTE at note 7 quotes USA today indicating that California has the highest percentage of unlisted numbers with three metropolitan areas having over 64%, while Florida has the lowest. Likewise, NYNEX has experienced similarly high numbers with some areas, such as Brooklyn, at close to 50%. This data further supports the notion that the characteristics of the public switched telephone network and subscribing consumers varies based on geography and demographics. Without further information, NYNEX is unable to provide a complete analysis of MCI's study. The same cannot be said for Pacific

data MCI presents is not definitive. NYNEX is concerned with the lack of study data examining the demand for number portability at various consumer price points. NYNEX believes it is unlikely that consumers will be offered number portability capabilities at no charge because network providers will have to make investments to provide number portability. NYNEX believes that any policy decision must consider how price affects consumer demand and a carrier's ability to invest and provide this service.

NYNEX believes that number portability will enhance, facilitate and/or support competition here in the United States. That is why NYNEX has been deeply involved with the other industry members studying number portability, has offered interim solutions to competitors, and is participating in a trial of a database solution in New York.

However, NYNEX clearly believes competition can and will grow without number portability. Thus, the industry does not have to rush towards implementation with a solution that has large deficiencies or that is incapable of evolving for future needs. The Commission should promote interim arrangements, such as those that NYNEX offers, because they can and are filling the gap until a long term solution is available. Thus, the industry can afford to implement long term solutions(s) correctly, the first time. Additionally, as mentioned above, of great importance is the relationship between the costs to consumers of implementing number portability and their willingness to pay for the benefit. This information has yet to be quantified and clearly deserves further detailed study. Nevertheless, NYNEX believes that the supposed "enthusiasm" consumers displayed for number portability in the MFS and MCI studies

Bell, which provided clear, complete and thorough results only to have opponents later attack their study vehemently.

would be significantly dulled if a price tag for the capability was placed before them when asked the same questions.

V. FOR ANY IMPLEMENTATION OF A NUMBER PORTABILITY SCHEME TO BE SUCCESSFUL, THE FOLLOWING ISSUES SHOULD BE ADDRESSED.

A. All parties must cooperatively participate if number portability is to be a success.

Given the complexities surrounding a service provider number portability solution and the potential impact on the switched network, all industry members must be involved to ensure success. NYNEX agrees with the many parties that have pointed to industry fora, such as INC and the as yet to be formed NANC, to resolve and/or oversee the resolution of technical issues. However, NYNEX believes it should be emphasized that parties must attend and participate if their concerns are to be adequately addressed.²³

All local exchange providers competing within the same geographic serving areas should be prepared to implement like capabilities as the present incumbents.²⁴ Similarly, other carriers, such as wireless carriers, who are seeking to be treated as a substitute for wireline services should be prepared to implement like technical capabilities for number portability.²⁵ Otherwise, a level playing field for competitive entry and ongoing participation cannot be achieved. Competition cannot be allowed to become a one way street.

²³ Additionally, the willingness of various parties, such as AT&T, MCI, MFS, and Time Warner, to support an N-1 call processing scenario is significant in that it will take the LEC out of any perceived "bottleneck" role in the processing of calls to ported numbers/customers, a charge that has been specifically leveled at the interim number portability measures.

²⁴ This requirement should also extend to existing independent telephone companies which enter new serving areas as competitors.

²⁵ Claims that Wireless networks are different technically may be true but the Commission must study the threshold of where the scope of network modifications justifies exemption since wireline networks, as partially described above, will require extensive modifications as well.

B. The Commission should recognize that a long term solution for number portability will entail significant investment.

Few parties attempted to minimize the costs of number portability and NYNEX believes they may be significant, although no party can know for sure at this stage the precise magnitude of those costs. Thus, the trials discussed above can become more critical to developing reliable data in this area. For instance, NYT is tracking its costs during its participation in the New York Number Portability Trial. While these costs will not reflect the costs of widespread deployment because a limited number of offices will be involved and portions of the CPC "solution" are being provided for free,²⁶ it will add to the knowledge base regarding costs in this area. Thus, again it is critical that the Commission allow these trials to proceed.

Recognizing that significant investment and other costs may be incurred to deploy number portability, the Commission should establish pricing frameworks that do not hamper any particular carrier's ability to provide service nor to compete. No particular segment of the industry should bear the brunt or majority of the investment or costs. However, to be able to move forward in determining more of the details associated with these frameworks, NYNEX strongly urges the Commission to gather further factual evidence on consumer demand and benefits and compare this as well as the potential network investment. Without this information, an informed regulatory decision cannot be made as to the public interest. As NYNEX has noted above, it believes that allowing the ongoing and planned trials to work towards fruition will provide significant information in this regard.

²⁶ Although MCI Metro, as the database provider, will provide this capability for free during the trial, AT&T still plans to charge NYT for any end office switch generic software upgrades necessary to support the CPC addressing scheme.

Additionally, rewards and/or proper compensation for incumbents mandated to take on additional capabilities should be considered. For example, the possibility that incumbent carriers should always have the ability to query on terminating calls as a fail safe measure has been proposed. Others have proposed having carriers provide warnings to customers when a call will unexpectedly incur toll charges due to some implementation of number portability (most notably in a location portability environment).²⁷ Although these capabilities may be viewed as serving the public interest they place additional requirements, and thus costs, on carriers which should be compensated appropriately for providing such capabilities.

C. Strong administrative guidelines will be necessary.

A number of parties cited the need for strong guidelines if number portability processes are to work and the preservation of number resources are to be maintained.²⁸ The Commission cannot and should not encourage or mandate number portability capabilities without supporting these efforts with guidelines the Commission is willing to enforce.

VI. CONCLUSION

NYNEX recommends that the Commission focus on the implementation of service provider portability since that is clearly where the industry's interest lies, and because it holds the most potential of benefiting local competition. Any solution chosen should be capable of evolving to handle future needs -- e.g., location portability, and if it is not capable of such, should then be rejected. However, there is no support in the record for a Commission mandate at this time. Instead, NYNEX recommends the Commission adopt guiding principles to be used as

²⁷ See US West at 24.

²⁸ See SBC at 15.

it oversees the industry's efforts to gain a better understanding of what any potential implementation of number portability will mean and how it will impact consumers and the network. To help gain this understanding, NYNEX recommends the Commission allow the state trials underway or currently being planned, as well as other industry efforts, to progress to completion and utilize the findings of these activities as the Commission moves forward.

Respectfully submitted,

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I hereby certify that I caused a copy of the foregoing Reply Comments of the NYNEX Telephone Companies, to be sent by first class United States Mail, postage prepaid, to each of the parties indicated on the attached service list, this 12th day of October, 1995.


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